

MAR 22 2023

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

Vanessa R. Waldref
United States Attorney
Eastern District of Washington
Patrick J. Cashman
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Case No.: 2:22-CR-52-TOR-3

Plaintiff,

Plea Agreement

v.

SHAWN ROBSON,

Defendant.

Plaintiff United States of America, by and through Vanessa R. Waldref,
United States Attorney the Eastern District of Washington, and Patrick J.
Cashman, Assistant United States Attorney for the Eastern District of Washington,
and Defendant Shawn Robson ("Defendant"), both individually and by and
through Defendant's counsel, Ronald A. Van Wert, agree to the following Plea
Agreement.

1. Guilty Plea and Maximum Statutory Penalties

Defendant agrees to enter a plea of guilty to Count 6 of the Superseding
Indictment filed on June 7, 2022, which charges Defendant with Possession of
Stolen Ammunition, in violation of 18 U.S.C. §§ 922(j), 924(a)(2), a Class C
felony.

Defendant understands that the following potential penalties apply:

- a. a term of imprisonment of not more than 10 years;

- b. a term of supervised release not to exceed 3 years;
- c. a fine of up to \$250,000; and
- d. a \$100 special penalty assessment.

2. Supervised Release

Defendant understands that if Defendant violates any condition of Defendant's supervised release, the Court may revoke Defendant's term of supervised release, and require Defendant to serve in prison all or part of the term of supervised release authorized by statute for the offense that resulted in such term of supervised release without credit for time previously served on postrelease supervision, up to the following terms:

- a. 5 years in prison if the offense that resulted in the term of Supervised Release is a class A felony,
- b. 3 years in prison if the offense that resulted in the term of Supervised Release is a class B felony, and/or
- c. 2 years in prison if the offense that resulted in the term of Supervised Release is a class C felony.

Accordingly, Defendant understands that if Defendant commits one or more violations of supervised release, Defendant could serve a total term of incarceration greater than the maximum sentence authorized by statute for Defendant's offense or offenses of conviction.

3. The Court is Not a Party to this Plea Agreement

The Court is not a party to this Plea Agreement and may accept or reject it. Defendant acknowledges that no promises of any type have been made to Defendant with respect to the sentence the Court will impose in this matter.

Defendant understands the following:

- a. sentencing is a matter solely within the discretion of the Court;
- b. the Court is under no obligation to accept any recommendations made by the United States or Defendant;

- c. the Court will obtain an independent report and sentencing recommendation from the United States Probation Office;
- d. the Court may exercise its discretion to impose any sentence it deems appropriate, up to the statutory maximum penalties;
- e. the Court is required to consider the applicable range set forth in the United States Sentencing Guidelines, but may depart upward or downward under certain circumstances; and
- f. the Court may reject recommendations made by the United States or Defendant, and that will not be a basis for Defendant to withdraw from this Plea Agreement or Defendant's guilty plea.

4. Potential Immigration Consequences of Guilty Plea

If Defendant is not a citizen of the United States, Defendant understands the following:

- a. pleading guilty in this case may have immigration consequences;
- b. a broad range of federal crimes may result in Defendant's removal from the United States, including the offense to which Defendant is pleading guilty;
- c. removal from the United States and other immigration consequences are the subject of separate proceedings; and
- d. no one, including Defendant's attorney or the Court, can predict with absolute certainty the effect of a federal conviction on Defendant's immigration status.

Defendant affirms that Defendant is knowingly, intelligently, and voluntarily pleading guilty as set forth in this Plea Agreement, regardless of any immigration consequences that Defendant's guilty plea may entail.

1 5. Waiver of Constitutional Rights

2 Defendant understands that by entering this guilty plea, Defendant is
3 knowingly and voluntarily waiving certain constitutional rights, including the
4 following:

- 5 a. the right to a jury trial;
6 b. the right to see, hear and question the witnesses;
7 c. the right to remain silent at trial;
8 d. the right to testify at trial; and
9 e. the right to compel witnesses to testify.

10 While Defendant is waiving certain constitutional rights, Defendant
11 understands that Defendant retains the right to be assisted by an attorney through
12 the sentencing proceedings in this case and any direct appeal of Defendant's
13 conviction and sentence, and that an attorney will be appointed at no cost if
14 Defendant cannot afford to hire an attorney.

15 Defendant understands and agrees that any defense motions currently
16 pending before the Court are mooted by this Plea Agreement, and Defendant
17 expressly waives Defendant's right to bring any additional pretrial motions.

18 6. Elements of the Offense

19 The United States and Defendant agree that in order to convict Defendant of
20 Possession of Stolen Ammunition, in violation of 18 U.S.C. §§ 922(j), 924(a)(2),
21 the United States would have to prove the following beyond a reasonable doubt.

- 22 a. *First*, on or about April 26, 2022, within the Eastern District of
23 Washington, Defendant knowingly possessed stolen
24 ammunition;
25 b. *Second*, the ammunition had been shipped or transported in
26 interstate or foreign commerce; and
27
28

1 c. *Third*, at the time of the possession, Defendant knew or had
2 reasonable cause to believe that the ammunition has been
3 stolen.

4 7. Factual Basis and Statement of Facts

5 The United States and Defendant stipulate and agree to the following: the
6 facts set forth below are accurate; the United States could prove these facts beyond
7 a reasonable doubt at trial; and these facts constitute an adequate factual basis for
8 Defendant's guilty plea.

9 The United States and Defendant agree that this statement of facts does not
10 preclude either party from presenting and arguing, for sentencing purposes,
11 additional facts that are relevant to the Sentencing Guidelines computation or
12 sentencing, unless otherwise prohibited in this Plea Agreement.

13 In August 2021, the Federal Bureau of Investigation (FBI) and United States
14 Air Force Office of Special Investigations (AFOSI) initiated an investigation into
15 Airman John I. Sanger. The investigation involved the use of an undercover agent
16 (UC). During the course of the investigation into Airman Sanger, the FBI and
17 AFOSI learned Sanger was able to secure stolen military ammunition from a
18 member, later identified as Nathan Richards, of the Fairchild 92nd Security Forces
19 Squadron Combat Arms Training Management (CATM) section. The CATM is
20 responsible for ensuring members of the Air Force are trained and combat ready to
21 safely use and maintain all types of small arms. Richards invited Sanger, who in
22 turn invited the UC, to go shooting with he and other members of CATM at
23 Fishtrap Lake, in the Eastern District of Washington.

24 On March 12, 2022, the UC, Sanger, Richards, Eric Eagleton, and others
25 arrived (not including the Defendant) at Fishtrap Lake and engaged in target
26 shooting using stolen ammunition from the U.S. Air Force's CATM section. At
27 the conclusion of the event, Sanger was provided additional stolen ammunition
28

1 from Richards for his personal use. Sanger subsequently provided the UC a small
2 portion of the stolen ammunition.

3 Based upon the March 12, 2022 event and other investigative steps, the FBI
4 and OSI executed a series of search warrants at Sanger and Eagleton's residences
5 on April 26, 2022. Simultaneous to the execution of the search warrants, members
6 of the CATM, including the Defendant, were brought to local AFOSI office to be
7 interviewed. The Defendant was advised of and waived his Article 31(b), Uniform
8 Code of Military Justice (UCMJ) rights and provided a statement. During the
9 statement, the Defendant admitted to taking ammunition without authority from the
10 CATM section. The Defendant stated he was the CATM Non-Commissioned
11 Officer-In-Charge (NCOIC) and therefore was responsible for what happened in
12 that section. The Defendant indicated it was a pretty common practice.
13 Specifically, the Defendant identified a "slush fund" of ammunition which were
14 not accounted for. The Defendant further admitted to having a box of 7.62
15 ammunition, an unspecified amount of 5.56 ammunition, and an M68 red dop optic
16 at his residence without authorization. The Defendant subsequently consented to a
17 search of his residence, within the Eastern District of Washington. During a search
18 of the Defendant's residence, FBI and OSI agents located approximately 3,000
19 rounds of ammunition the Defendant had reasonable cause to believe was stolen as
20 he was not authorized to be in possession of it.

21 The Defendant stipulates the stolen ammunition traveled in interstate
22 commerce.

23 The Defendant has fully cooperated with law enforcement's investigation of
24 this matter. The Defendant voluntarily provided information to law enforcement
25 on three occasions: April 26, 2022, May 5, 2022, and June 2, 2022. In addition to
26 consenting to the search of his residence, Defendant's cooperation assisted law
27 enforcement in furtherance of its investigation and identification of other co-
28 defendants.

1 8. The United States' Agreements

2 The United States Attorney's Office for the Eastern District of Washington
3 agrees that at the time of sentencing, the United States will move to dismiss:

4 Count 1 – Conspiracy to Commit Theft of Government Property and
5 Possession of Stolen Ammunition, in violation of 18 U.S.C. § 371; and

6 Count 13 – Receiving Stolen Government Property, in violation of 18
7 U.S.C. § 641.

8 The United States Attorney's Office for the Eastern District of Washington
9 agrees not to bring additional charges against Defendant based on information in
10 its possession at the time of this Plea Agreement that arise from conduct that is
11 either charged in the Indictment or identified in discovery produced in this case,
12 unless Defendant breaches this Plea Agreement before sentencing.

13 9. United States Sentencing Guidelines Calculations

14 Defendant understands and acknowledges that the United States Sentencing
15 Guidelines ("U.S.S.G." or "Guidelines") apply and that the Court will determine
16 Defendant's advisory range at the time of sentencing, pursuant to the Guidelines.
17 The United States and Defendant agree to the following Guidelines calculations.

18 a. Base Offense Level

19 The United States and the Defendant agree that the base offense level for
20 Possession of Stolen Ammunition, in violation of 18 U.S.C. §§ 922(j), 924(a)(2) is
21 12. U.S.S.G. § 2K2.1(a)(7).

22 b. Specific Offense Characteristics

23 The United States and the Defendant make no agreement on the application
24 of specific offense characteristics. The parties are free to argue for or against the
25 application of any specific offense characteristics.

26 c. Acceptance of Responsibility

27 The United States will recommend that Defendant receive a two-level
28 downward adjustment for acceptance of responsibility, pursuant to U.S.S.G.

1 § 3E1.1(a), if Defendant does the following:

- 2 i. accepts this Plea Agreement;
- 3 ii. enters a guilty plea at the first Court hearing that takes
- 4 place after the United States offers this Plea Agreement;
- 5 iii. demonstrates recognition and affirmative acceptance of
- 6 Defendant's personal responsibility for Defendant's
- 7 criminal conduct;
- 8 iv. provides complete and accurate information during the
- 9 sentencing process; and
- 10 v. does not commit any obstructive conduct.

11 The United States and Defendant agree that at its option and on written
12 notice to Defendant, the United States may elect not to recommend a reduction for
13 acceptance of responsibility if, prior to the imposition of sentence, Defendant is
14 charged with, or convicted of, any criminal offense, or if Defendant tests positive
15 for any controlled substance.

16 d. No Other Agreements

17 The United States and Defendant have no other agreements regarding the
18 Guidelines or the application of any Guidelines enhancements, departures, or
19 variances. Defendant understands and acknowledges that the United States is free
20 to make any sentencing arguments it sees fit, including arguments arising from
21 Defendant's uncharged conduct, conduct set forth in charges that will be dismissed
22 pursuant to this Agreement, and Defendant's relevant conduct.

23 e. Criminal History

24 The United States and Defendant have no agreement and make no
25 representations about Defendant's criminal history category, which will be
26 determined by the Court after the United States Probation Office prepares and
27 discloses a Presentence Investigative Report.

1 10. Cooperation

2 The Defendant agrees to cooperate completely and truthfully with the United
3 States as follows:

4 a) Debriefings:

5 The Defendant agrees to participate in full debriefings by federal and local
6 investigative agencies about all the Defendant's knowledge of illegal conduct, at
7 times and places to be decided by these agencies. The Defendant agrees to provide
8 complete, accurate and truthful information to these agencies. The Defendant
9 agrees to not falsely implicate any person or entity and agrees to not protect any
10 person or entity through false information or omission.

11 It is understood that the Defendant may have an attorney present at any or all
12 such debriefings.

13 b) Testimony:

14 The Defendant agrees to testify completely and truthfully at any subsequent
15 hearing, grand jury proceeding, or other federal or state court proceeding involving
16 co-defendants or any other person involved in criminal activity.

17 Both the Defendant and the United States agree to request a reasonable
18 continuance of the sentencing date in order to ensure that the Defendant testifies
19 pursuant to this provision prior to sentencing.

20 c) Documents:

21 The Defendant agrees to voluntarily produce all documents, records, or other
22 tangible evidence relating to matters about which the United States Attorney's
23 Office or law enforcement agencies inquire.

24 d) Recovery of Assets:

25 The Defendant agrees to fully cooperate in the identification and recovery of
26 assets to pay restitution and further agrees that if any proceeds are in the
27 Defendant's possession or control, the Defendant will immediately relinquish them
28 to the United States.

1 e) Notification:

2 The Defendant agrees to immediately notify the United States Attorney's Office
3 if the Defendant is contacted, interviewed, subpoenaed or requested to testify for or
4 against any other person.

5 f) Effect of Breach:

6 The Defendant agrees that if the Defendant breaches this Plea Agreement,
7 the agreement is null and void and the Defendant expressly waives the right to
8 challenge the initiation of additional charges against the Defendant for any
9 criminal activity and agrees that the United States may make derivative use of and
10 may pursue any investigative leads suggested by the Defendant's statements and
11 cooperation.

12 This agreement does not protect the Defendant from prosecution for perjury,
13 obstruction of justice, or any other offense should the Defendant commit any crime
14 during the Defendant's cooperation under this agreement.

15 j) Substantial Assistance:

16 The United States also agrees that if the Defendant provides full, truthful,
17 and complete cooperation, at sentencing, it will move pursuant to USSG §5K1.1
18 (Substantial Assistance to Authorities) and 18 U.S.C. § 3553(e) for a downward
19 departure. USSG §5K1.1 provides as follows:

20 Upon motion of the government stating that the defendant has provided
21 substantial assistance in the investigation or prosecution of another person who has
22 committed an offense, the court may depart from the guidelines.

23 (a) The appropriate reduction shall be determined by the court for
24 reasons stated that may include, but are not limited to,
25 consideration of the following:

26 (1) the court's evaluation of the significance and usefulness of
27 the defendant's assistance, taking into consideration the
28 government's evaluation of the assistance rendered;

- 1 (2) the truthfulness, completeness, and reliability of any
2 information or testimony provided by the defendant;
3 (3) the nature and extent of the defendant's assistance;
4 (4) any injury suffered, or any danger or risk of injury to the
5 defendant or his family resulting from his assistance;
6 (5) the timeliness of the defendant's assistance.

7 USSG §5K1.1(a)(1), (5).

8 The Defendant acknowledges that he has *not* completed providing
9 substantial assistance at the time of the entry into this Plea Agreement and that the
10 United States is not bound to move for a downward departure unless the Defendant
11 provides information that is fully truthful and complete and that the Defendant
12 testifies truthfully and completely at any hearing, trial, grand jury proceeding, or
13 other court proceeding if called as a witness by any party. The Defendant
14 understands that it may be necessary to continue the sentencing date in order to
15 verify full compliance with the Plea Agreement.

16 The Defendant acknowledges and agrees that if he fails to complete his
17 efforts to provide substantial assistance by refusing reasonable requests to meet
18 with law enforcement agents, by providing false information or withholding
19 information from agents, or by failing to testify completely, truthfully, and
20 honestly, the United States is under no obligation to file a motion for a downward
21 departure pursuant to USSG §5K1.1 or 18 U.S.C. § 3553(e), and the Plea
22 Agreement shall be considered breached and null and void. The United States may
23 then prosecute the Defendant on all available charges, including making false
24 statements and perjury.

25 11. Incarceration/Probation

26 The United States agrees to recommend no jail time in consideration of
27 Defendant's cooperation. Further, the United States and Defendant each agree to
28 recommend 3 years of supervised release in consideration of his cooperation.

1 Defendant agrees that the Court's decision regarding the conditions of Defendant's
2 Supervised Release is final and non-appealable; that is, even if Defendant is
3 unhappy with the conditions of Supervised Release ordered by the Court, that will
4 not be a basis for Defendant to withdraw Defendant's guilty plea, withdraw from
5 this Plea Agreement, or appeal Defendant's conviction, sentence, or any term of
6 Supervised Release.

7 The United States and Defendant agree to recommend that in addition to the
8 standard conditions of supervised release imposed in all cases in this District, the
9 Court should also impose the following conditions:

- 10 a. The United States Probation Officer may conduct, upon
11 reasonable suspicion, and with or without notice, a search of
12 Defendant's person, residences, offices, vehicles, belongings,
13 and areas under Defendant's exclusive or joint control.
14 b. Undergo a mental health evaluation and follow any recommend
15 treatment.

16 12. Criminal Fine

17 The United States and Defendant may make any recommendation
18 concerning the imposition of a criminal fine. Defendant acknowledges that the
19 Court's decision regarding a fine is final and non-appealable; that is, even if
20 Defendant is unhappy with a fine ordered by the Court, that will not be a basis for
21 Defendant to withdraw Defendant's guilty plea, withdraw from this Plea
22 Agreement, or appeal Defendant's conviction, sentence, or fine.

23 13. Mandatory Special Penalty Assessment

24 Defendant agrees to pay the \$100 mandatory special penalty assessment to
25 the Clerk of Court for the Eastern District of Washington, pursuant to 18 U.S.C.
26 § 3013.

1 14. Payments While Incarcerated

2 If Defendant lacks the financial resources to pay the monetary obligations
3 imposed by the Court, Defendant agrees to earn money toward these obligations by
4 participating in the Bureau of Prisons' Inmate Financial Responsibility Program.

5 15. Additional Violations of Law Can Void Plea Agreement

6 The United States and Defendant agree that the United States may, at its
7 option and upon written notice to the Defendant, withdraw from this Plea
8 Agreement or modify its sentencing recommendation if, prior to the imposition of
9 sentence, Defendant is charged with or convicted of any criminal offense or tests
10 positive for any controlled substance.

11 16. Waiver of Appeal Rights

12 Defendant understands that Defendant has a limited right to appeal or
13 challenge Defendant's conviction and the sentence imposed by the Court.

14 Defendant expressly waives all of Defendant's rights to appeal Defendant's
15 conviction and the sentence the Court imposes.

16 Defendant expressly waives Defendant's right to appeal any fine, term of
17 supervised release, or restitution order imposed by the Court.

18 Defendant expressly waives the right to file any post-conviction motion
19 attacking Defendant's conviction and sentence, including a motion pursuant to 28
20 U.S.C. § 2255, except one based on ineffective assistance of counsel arising from
21 information not now known by Defendant and which, in the exercise of due
22 diligence, Defendant could not know by the time the Court imposes sentence.

23 Nothing in this Plea Agreement shall preclude the United States from
24 opposing any post-conviction motion for a reduction of sentence or other attack
25 upon the conviction or sentence, including, but not limited to, writ of habeas
26 corpus proceedings brought pursuant to 28 U.S.C. § 2255.

1 17. Compassionate Release

2 In consideration for the benefits Defendant is receiving under the terms of
3 this Plea Agreement, Defendant expressly waives Defendant's right to bring any
4 motion for Compassionate Release other than a motion arising from one of the
5 specific bases set forth in this paragraph of this Plea Agreement. The United States
6 retains the right to oppose, on any basis, any motion Defendant files for
7 Compassionate Release.

8 The only bases on which Defendant may file a motion for Compassionate
9 Release in the Eastern District of Washington are the following:

10 a. Medical Condition of Defendant

- 11 i. Defendant is suffering from a terminal illness (i.e., a
12 serious and advanced illness with an end of life
13 trajectory). A specific prognosis of life expectancy (i.e.,
14 a probability of death within a specific time period) is not
15 required. Examples include metastatic solid-tumor
16 cancer, amyotrophic lateral sclerosis (ALS), end-stage
17 organ disease, and advanced dementia; or
18 ii. Defendant is suffering from a serious physical or medical
19 condition, a serious functional or cognitive impairment,
20 or deteriorating physical or mental health because of the
21 aging process that substantially diminishes the ability of
22 the defendant to provide self-care within the environment
23 of a correctional facility and from which Defendant is not
24 expected to recover.

25 b. Age of Defendant

- 26 i. Defendant is at least 65 years old, is experiencing a
27 serious deterioration in physical or mental health because
28 of the aging process; and has served at least 10 years or

1 75 percent of Defendant's term of imprisonment,
2 whichever is less; or

- 3 ii. Defendant is at least 70 years old and has served at least
4 30 years in prison pursuant to a sentence imposed under
5 18 U.S.C. § 3559(c) for the offense or offenses for which
6 Defendant is imprisoned.

7 c. Family Circumstances

- 8 i. The caregiver of Defendant's minor child or children has
9 died or become incapacitated, and Defendant is the only
10 available caregiver for Defendant's minor child or
11 children; or
12 ii. Defendant's spouse or registered partner has become
13 incapacitated, and Defendant is the only available
14 caregiver for Defendant's spouse or registered partner.

15 d. Subsequent Reduction to Mandatory Sentence

- 16 i. Defendant pleaded guilty to an offense which, on the date
17 of Defendant's guilty plea, carried a mandatory minimum
18 sentence; and
19 ii. after the entry of judgment, the length of the mandatory
20 minimum sentence for Defendant's offense of conviction
21 was reduced by a change in the law; and
22 iii. the application of the reduced mandatory minimum
23 sentence would result in Defendant receiving a lower
24 overall sentence.

25 e. Ineffective Assistance of Counsel

- 26 i. Defendant seeks Compassionate Release based on a
27 claim of ineffective assistance of counsel arising from
28 information that Defendant both

2. did not know at the time of Defendant's guilty plea, and
3. could not have known, in the exercise of due diligence, at the time the Court imposed sentence.

18. Withdrawal or Vacatur of Defendant's Plea

Should Defendant successfully move to withdraw from this Plea Agreement or should Defendant's conviction be set aside, vacated, reversed, or dismissed under any circumstance, then:

- a. this Plea Agreement shall become null and void;
- b. the United States may prosecute Defendant on all available charges;
- c. The United States may reinstate any counts that have been dismissed, have been superseded by the filing of another charging instrument, or were not charged because of this Plea Agreement; and
- d. the United States may file any new charges that would otherwise be barred by this Plea Agreement.

The decision to pursue any or all of these options is solely in the discretion of the United States Attorney's Office.

Defendant agrees to waive any objections, motions, and defenses Defendant might have to the United States' decision about how to proceed, including a claim that the United States has violated Double Jeopardy.

Defendant agrees not to raise any objections based on the passage of time, including but not limited to, alleged violations of any statutes of limitation or any objections based on the Speedy Trial Act or the Speedy Trial Clause of the Sixth Amendment.

1 19. Integration Clause

2 The United States and Defendant acknowledge that this document
3 constitutes the entire Plea Agreement between the United States and Defendant,
4 and no other promises, agreements, or conditions exist between the United States
5 and Defendant concerning the resolution of the case.

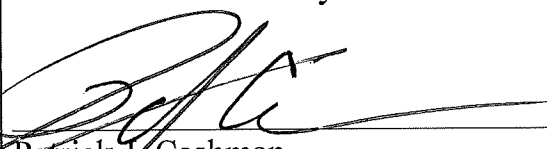
6 This Plea Agreement is binding only on the United States Attorney's Office
7 for the Eastern District of Washington, and cannot bind other federal, state, or local
8 authorities.

9 The United States and Defendant agree that this Agreement cannot be
10 modified except in a writing that is signed by the United States and Defendant.

11 Approvals and Signatures

12 Agreed and submitted on behalf of the United States Attorney's Office for
13 the Eastern District of Washington.

14 Vanessa R. Waldref
15 United States Attorney

16 
17 _____
18 Patrick J. Cashman
19 Assistant United States Attorney

3-22-2023
Date

1
2 I have read this Plea Agreement and I have carefully reviewed and discussed
3 every part of this Plea Agreement with my attorney. I understand the terms of this
4 Plea Agreement. I enter into this Plea Agreement knowingly, intelligently, and
5 voluntarily. I have consulted with my attorney about my rights, I understand those
6 rights, and I am satisfied with the representation of my attorney in this case. No
7 other promises or inducements have been made to me, other than those contained
8 in this Plea Agreement. No one has threatened or forced me in any way to enter
9 into this Plea Agreement. I agree to plead guilty because I am guilty.
10

11 

12
13 Shawn Robson
Defendant

03-22-2023

Date

14 I have read the Plea Agreement and have discussed the contents of the
15 agreement with my client. The Plea Agreement accurately and completely sets
16 forth the entirety of the agreement between the parties. I concur in my client's
17 decision to plead guilty as set forth in the Plea Agreement. There is no legal
18 reason why the Court should not accept Defendant's guilty plea.

19 
20

21 Ron Van Wert
Attorney for Defendant

03-22-2023

Date